

# **EXHIBIT B**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (FM) ECF Case
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*This document relates to:*

*Kathleen Ashton, et al. v. Al Qaeda Islamic Army, et al., Case No. 02 Civ. 6977*  
*Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al., No. 03 Civ. 9849*  
*Federal Insurance Co., et al. v. Al Qaida, et al., No. 03 Civ. 6978*  
*Estate of John P. O'Neill, Sr., et al. v. Al Baraka, et al., No. 04 Civ. 1923*  
*Continental Casualty Co., et al. v. Al Qaeda, et al., No. 04 Civ. 5970*  
*Cantor Fitzgerald & Co., et al. v. Akida Bank Private Ltd, et al., No. 04 Civ. 7065*  
*Euro Brokers Inc., et al., v. Al Baraka, et al., No. 04 Civ. 7279*

**PLAINTIFFS' SUPPLEMENTAL REQUESTS  
FOR PRODUCTION OF DOCUMENTS TO WAEI JELAIKAN**

THE MDL 1570 PLAINTIFFS'  
EXECUTIVE COMMITTEES  
July 31, 2012

**PLAINTIFFS' SUPPLEMENTAL REQUESTS  
FOR PRODUCTION OF DOCUMENTS TO WAEEL JELAIDAN**

Plaintiffs in *Kathleen Ashton, et al. v. Al Qaeda Islamic Army, et al.*, Case No. 02 Civ. 6977, *Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al.*, Case No. 03 Civ. 9849, *Federal Insurance Co., et al. v. al Qaida, et al.*, Case No. 03 Civ. 6978, *Estate of John P. O'Neill, Sr., et al. v. Al Baraka, et al.*, Case No. 04 Civ. 1923, *Continental Casualty Co., et al. v. Al Qaeda, et al.*, Case No. 04 Civ. 5970, *Cantor Fitzgerald & Co., et al. v. Akida Bank Private Ltd, et al.*, Case No. 04 Civ. 7065, and *Euro Brokers Inc., et al., v. Al Baraka, et al.*, Case No. 04 Civ. 7279, propound and serve on Wael Jelaidan the following supplemental Requests for Production of Documents to be answered fully and under oath, pursuant to Rule 34 of the Federal Rules of Civil Procedure, within 30 days of their receipt.

The "Instructions" and "Definitions" set forth in the Plaintiffs' First Set of Requests for Production of Documents Part A and Part B Directed to Wael Jelaidan are incorporated herein by reference, except the following definition shall also apply:

1. The terms "Defendant," "You," and "Your" shall refer to Wael Jelaidan (a/k/a Wa'il Jlaydan, Wa'il Hamza Julaydan, Wa'el Hamza Juliadan, Wa'el Hamza Jalaidin, Wael Hamzah Jelaidan, Wa'il Hamza Julaidan, Wa'el Hamza Julaydan, Wa'il Hamza Jaladin, Abu al Hassan, Abu al Hasan al Madani, Wael Hamzah Jaleedan) and his trustee, employee, attorney, consultant, accountant, agent, alter ego, volunteer, or other legal representative acting on Wael Jelaidan's behalf.

2. The time frame for the requested documents, unless otherwise noted or agreed, is 1988 to present.

**PLAINTIFFS' SUPPLEMENTAL REQUESTS  
FOR PRODUCTION OF DOCUMENTS TO Wael JEL Aidan**

**SUPPLEMENTAL DISCOVERY REQUESTS**

1. Please provide all documents relating to Bank Austria including but not limited to account #573301587 at Bank Austria in Vienna established or held in the name of, on behalf of and/or for the benefit of Wael Jelaidan. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among Wael Jelaidan and Bank Austria in Vienna documents detailing the establishment of and/or closing of the account, suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from that account.

**ANSWER:**

2. Please provide all documents Wael Jelaidan sent to and/or received from the Third World Relief Agency (or "TWRA"), including without limitation, all documents relating to the transfer of funds between Wael Jelaidan and the TWRA.

**ANSWER:**

3. Please provide all documents relating to all accounts in any banking or financial institution that Wael Jelaidan currently holds, or has held, jointly with or on behalf of the TWRA.

**ANSWER:**

4. Please provide all documents relating to the proposal to remove Wael Julaidan from his position within Rabita on or about the year 2003, including but not limited to any documents exchanged with or provided by/to the Muslim World League, the Government of Pakistan, the Kingdom of Saudi Arabia, or any of their instrumentalities.

**ANSWER:**

5. Please provide all documents, correspondence, letters, memoranda, notes, reports, and/or emails relating to any relationship between Wael Jelaidan and Abdullah bin Abdul Muhsin Al Turki.

**ANSWER:**

6. Please provide all documents referring or related to Muwafaq Foundation (a/k/a Blessed Relief, Muwafaq Al-Khayriyya Benevolent Foundation, Muwafaq Society).

**ANSWER:**

7. Please provide all documents referring or related to Depozitna Bank, Bosnia.

**ANSWER:**

8. Please provide all documents referring or related to Amer Mahdi Saleh.

**ANSWER:**

9. Please provide all documents referring or related to Adel Muhammad Sadiq bin Kazem.

**ANSWER:**

10. Please provide all documents referring or related to Maram Import Export Company or Maram Company (Turkey).

**ANSWER:**

11. Please provide all documents referring or related to Al-Iman University or Al-Eman University (Yemen).

**ANSWER:**

12. Please provide all documents referring or related to Plan Bojinka or Project Bojinka.

**ANSWER:**

13. Please provide all documents referring or related to Hani Hanjour.

**ANSWER:**

14. Please provide all documents referring or related to CRM Airline Training Center (Scottsdale, Arizona).

**ANSWER:**

15. Please provide all documents referring or related to Arizona Aviation Flight School (Phoenix, Arizona).

**ANSWER:**

16. Please provide all documents referring or related to Sawyer School of Aviation (Phoenix, Arizona).

**ANSWER:**

17. Please provide all documents referring or related to the Saudi Joint Relief Committee.

**ANSWER:**

18. Please provide all documents referring or related to Salman bin Abdulaziz Al Saud.

**ANSWER:**

19. Please provide all documents referring or related to Ramazi Ahmed Yousuf (a/k/a Ramzi Ahmed Yousef, Abdul Basit, Abdul Karim, Abdul Basit Mahmoud Abdul Karim, Adam Sali, Adam Ali Balauch, Adam Ali Qasim, Arnaldo Forlani, Azan Mohammed, Naji Owaidah Haddad, Najy Awaita Haddad, Rashid, Yonis).

**ANSWER:**

20. Please provide all documents referring or related to Hassan al-Turabi.

**ANSWER:**

21. Please provide all documents referring or related to the Saudi Red Crescent.

**ANSWER:**

22. Please provide all documents referring or related to Abdul Hakim Murad (a/k/a Abdul Hakim, Abdul Hakim Al Hashim Murad, Ahmed Saeed, Saeed Ahmed, Saeed Akman).

**ANSWER:**



23. Please provide all documents referring or related to Wael Jelaidan's firm Meram Seyahat.

**ANSWER:**

24. Please provide all documents referring or related to Privredna Banka Zagreb, including but not limited to, account #24116815430-71961, in the name Wael Hamzah A. Jelaidan.

**ANSWER:**

25. Please provide all documents referring or related to Ghassan Dahduli.

**ANSWER:**

26. Please provide all documents referring or related to Abdullah Ahmed Abdullah (a/k/a Abu Mohmaed al Masry).

**ANSWER:**

27. Please provide all documents referring or related to Al Gama'a al Islamiyya (a/k/a "The Islamic Group").

**ANSWER:**

28. Please provide all documents referring or related to Ali Mohamed.

**ANSWER:**

29. Please provide all documents referring or related to Bait-ul-Ansar (a/k/a the "Mujahadeen Services Bureau" or "House of Helpers").

**ANSWER:**

30. Please provide all documents referring or related to Dr. Ayman Al Zawahiri.

**ANSWER:**

31. Please provide all documents referring or related to Mamdouth Mahmud Salim (a/k/a Abu Hajer, Abu Hajer al Iraqi, Mandouh Salim).

**ANSWER:**

32. Please provide all documents referring or related to Mohammed Suleiman al Nalfi.

**ANSWER:**

33. Please provide all documents referring or related to Muhsin Musa Matwalli Atwah (a/k/a Abdel Rahman al Muhajer).

**ANSWER:**

34. Please provide all documents referring or related to Osama Bin Laden.

**ANSWER:**

35. Please provide all documents referring or related to Abdel Hadi Taher.

**ANSWER:**

36. Please provide all documents referring or related to Abu Mohamed al Maqdisi (a/k/a Mohamed Taher al Barqawi).

**ANSWER:**

37. Please provide all documents referring or related to Abu Rida al Suri (a/k/a Mohammed Loay Bayazid).

**ANSWER:**

38. Please provide all documents referring or related to Mohamed al Zawahiri.

**ANSWER:**

39. Please provide all documents referring or related to Salehuddin Abdel Jawad.

**ANSWER:**

40. Please provide all documents referring or related to Seik Ajadi.

**ANSWER:**

41. Please provide all documents referring or related to Sheikh Abdel Majid Zindani.

**ANSWER:**

42. Please provide all documents referring or related to Suleiman al Rashid.

**ANSWER:**

43. Please provide all documents referring or related to Al Haramain & Al Masjed Al Aqsa Charity Foundation.

**ANSWER:**

44. Please provide all documents referring or related to Al Haramain Islamic Foundation.

**ANSWER:**

45. Please provide all documents referring or related to Al Kifah Refugee Center.

**ANSWER:**

46. Please provide all documents referring or related to International Islamic Relief Organization.

**ANSWER:**

47. Please provide all documents referring or related to Lajnat al Dawa al Islamiyah Kuwait.

**ANSWER:**

48. Please provide all documents referring or related to World Assembly of Muslim Youth.

**ANSWER:**

49. Please provide all documents referring or related to Abdullah bin Abdul Mohsin Al Turki.

**ANSWER:**

Defendant Wael Jelaidan has objected to Plaintiffs first set of production of documents Part B, requests B12-B14, B38-B43, on grounds "that it is a multiple document request ostensibly portrayed as a single document request." In an attempt to accommodate Defendant's objection, without conceding the validity of this objection and preserving all rights to compel full

answers to same, Plaintiffs reiterate those requests herein, to further specify, focus and break down these prior requests for production to Defendant for the sake of clarity. *See* Wael Jelaidan's Responses to the Plaintiffs' First Set of Requests for Production of Documents "Part B," dated September 13, 2006.

50. Please provide all documents referring or related to Hasan Cengic.

**ANSWER:**

51. Please provide all documents referring or related to Karavan Development Group Ltd., Caravan Development Group Ltd., or Karavan Construction and Development.

**ANSWER:**

52. Please provide all documents referring or related to Ayadi Chafiq bin Muhammad (a/k/a Ayadi Chafik, ben Muhammad, Chafiq Ayadi, Ben Muhammad Ayadi Shafiq, Ayadi Shafiq).

**ANSWER:**

53. Please provide all documents referring or related to Eurovest.

**ANSWER:**

54. Please provide all documents referring or related to Yassin al Kadi (a/k/a Yassin al Qadi, Yassin Abdullah Kadi, Yasin Abdullah al Qadi, Yasin Kahdi, Yassin Quadi).

**ANSWER:**

55. Please provide all documents referring or related to Mohammed Jamal Khalifa (a/k/a Abdallah Khalifahm Abu Bara, Abu al Bara, Abdul Barashid, Abi Bara, Abu Barra, Abu Barashid, Abu El Bara'a, Abu Salah, Chej Salah, Jamal Khalifa).

**ANSWER:**

56. Please provide all documents referring or related to Abu Zubaydah (a/k/a Abu Zubaida, Abu Zubayah, Abu Zubayda, Abu Zubeida, Zain Al-Abidin Muhahhad Husain, Zayn Al-Abidin Mohammed Husayn, Zayn Al-Abidin Muhammad Husayn, Zein Abedein Mohammad Hassan, Abd Al-Hadi Al-Wahab, Hani, Tariq).

**ANSWER:**

57. Please provide all documents referring or related to Mohammed Atef (a/k/a Abu Hafs, Abu Hafs Al Masri, Abu Hafs Al-Masri).

**ANSWER:**

58. Please provide all documents referring or related to Tucson Islamic Center (a/k/a Islamic Center of Tucson, Arizona).

**ANSWER:**

59. Please provide all documents referring or related to Wadih El-Hage (a/k/a Abu Abdullah, Abu Abdullah Al-Lubnani, Abu al-Sabbour).

**ANSWER:**

60. Please provide all documents referring or related to Sheik Abdullah Azzam.

**ANSWER:**

61. Please provide all documents referring or related to Mektab al Khidmat (a/k/a Maktab al Khidmat, Al-Kifah, Human Services Organization).

**ANSWER:**

62. Please provide all documents referring or related to Enaam Arnaout (a/k/a Enaam Mahmoud Arnaout, Abdel Samia, Abu Mahmoud, Abu Mahmoud al Hamawi, Abu Mahmoud al-Hamnawi).

**ANSWER:**

Dated: July 31, 2012

Respectfully submitted,

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THE MDL 1570 PLAINTIFFS'  
EXECUTIVE COMMITTEES



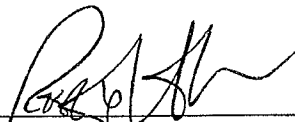
**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the Plaintiffs' Supplemental Requests for Production of Documents Directed to Wael Jelaidan was served via electronic mail this 31st day of July 2012, upon:

Martin F. McMahon, Esquire  
MARTIN F. MCMAHON & ASSOCIATES  
1150 Connecticut Avenue, NW, Suite 900  
Washington, DC 20036

Alan R. Kabat, Esquire  
BERNABEI & WACHTEL, PLLC  
1775 T Street, NW  
Washington, DC 20009-7124

(Defendants' Executive Committee's appointed representative to receive discovery requests and responses in 03-MDL-1570)

  
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Robert T. Haefe, Esquire